



COMMISSION FOR THE PRESERVATION OF WILD HORSES

Stewart Facility
Capitol Complex
Carson City, Nevada 89710
(702) 687-5589
February 1, 1991

Dan Keiserman, *Chairman*
Las Vegas, Nevada

Michael Kirk, D.V.M., *Vice Chairman*
Reno, Nevada

Paula S. Askew
Carson City, Nevada

Steven Fulstone
Smith Valley, Nevada

Dawn Lappin
Reno, Nevada

John Walker, Coordinator
Nevada State Clearinghouse
Department of Administration
Blasdel Building, Rm. 204
Carson City, Nevada 89710

Dear Mr. Walker,

Thank you for the opportunity to review and comment on the Draft Special Nevada Report.

The Draft Special Nevada Report leaves us with a multitude of questions and on the other hand many suggestions for corrections of the misinformation that has been presented. We feel that this report is grossly lacking in pertinent information that would present the entire picture of the impacts of this decision. The lack of information has resulted in a report that is misleading with its misrepresentations.

The report doesn't address the destruction of the resource for future use...what will be the long term effects of the military use of this land? How will this impact area's around these military lands? The report looks at just these lands and not the effect on surrounding areas. Our concerns are for the resource and how its managed.

The report was prepared from 1988 data. New data must be gathered and the correct data supplied.

The Commission for the Preservation of Wild Horses for the State of Nevada has protested (Exhibit 1), the Director of the Bureau of Land Management the delineation of the boundary for the Nevada Wild Horse Range is improper and not in compliance with PL92-195. Numerous BLM documents readily admit that wild horses occupied range outside the Nevada Wild Horse Range in 1971, when Congress instructed BLM to determine wild horse habitat in December 1971. Arbitrarily dismissing horses outside that boundary does not recognize the seasonal movement or habitat requirements. Paragraph two, page 2-68 tells the reader that 200 wild horses occupied the Nevada Wild Horse Range in 1963, and gives the impression that the census of 1988 of 6,233 horses (Exhibit 2), were in the Nevada Wild Horse Range whose boundary is one-tenth of the Nevada Air Force Range where the horses were actually censused. There has been an indication that the 1988 census was in error since the 1991 census has produced a population of 4,302 horses (Exhibit 3). The latter census being more in line with previous census' and removals. The fact that BLM is missing 2000 horses from the last census (1988 - 6,233) gives us some apprehension on how much the Desert Research

John Walker, Coordinator
February 1, 1991
Page 2

Institute relied on BLM provided data; and how that skewed data affects management and Congress' opinion on this Special Nevada Report.

Page 2-69, paragraph three states, the "...preferred alternative for land management of the North Ranges would result in a reduction of wild horse numbers to the thriving ecological balance on the Nevada Wild Horse Range, and removal of horses from areas outside the Wild Horse Range." In August 1988, flooding washed out the water source for horses at Breen Creek.

We have just been informed that Breen Creek water volume production has dried up, Rose Creek has reduced to a trickle, (one of the more dependable sources), Tunnel Spring is DRY, Silver Bow is flowing at approximately $\frac{1}{2}$ the capacity of last season (currently at 2 quarts/minute), and Cedar Well is flowing at 3 oz./minute. This is another disaster waiting to happen, yet we have not been notified by BLM. There is an overall hydrology problem on the Nellis Air Force Range Complex that hasn't even been addressed in this Special Nevada Report. If this issue hasn't been addressed in this report then how can we be assured that other areas under consideration have not been ignored as well.

We also have real questions to water quality. The Nevada Report prematurely dismisses consideration of water quality when it does not directly affect humans, but does not address how quality of water affects wildlife and wild horse populations.

What effects will the water rights allocated to the military have on neighboring users (to include wild horses)? In 1988, an "error" on the part of Reynold Electric and Engineering Co. (Exhibit 4), on the Nellis Air Force Range resulted in the deaths of 61 wild horses. Ground water was tainted, not only did horses die but what other impacts did this "poisoning" have? As a result of the above toxic spill, the settlement between the State of Nevada vs REECO, required REECO to develop and/or reconstruct three water sources for use by wild horses (Exhibit 5). The toxic spill incident is not documented in this report.

No maps were supplied with the Special Nevada Report, we have no idea what wild horse herd areas will be affected, what wild horse water supplies will be affected, and is there a possibility that shallow water aquifers will be "polluted" beyond use? By not supplying maps it leaves a questions in our minds as to where exactly the 586,000 acres of public grazing land is being taken from.

Another concern of this Commission is the foaling season of herd areas to be affected. The report deals with an additional 10,000 square miles of air space for the Fallon Naval Air Station. The Bureau of Land Management does not fly herd areas from March through June, for either census reasons or helicopter gathers to reduce stress to the horses during their foaling season. How can we be assured that this factor has been taken into account before allowing the military additional air space.

The Commission reserves the right to comment further after

John Walker, Coordinator
February 1, 1991
Page 3

being supplied with maps showing us what areas are to be acquired and exactly what wild horse herd areas are affected.

We cannot emphasize strongly enough that the Desert Research Institute consider the updated and correct information supplied to them and incorporate that information in the final Special Nevada Report so that Congress will have accurate data to base their judgement on.

Sincerely,

CATHERINE BARCOMB
Executive Director

Enc.